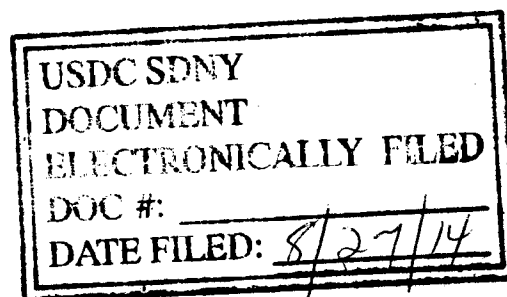


Patterson, P.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



TRAYON CHRISTIAN,

Plaintiff,

14-cv-1303 (RPP)

-against-

**JOINT PROPOSED
DISCOVERY PLAN**

BARNEYS NEW YORK INC., THE CITY OF NEW
YORK, POM ALEXANDER KREMER, LSA
STEPHEN BARRETT, THE NEW YORK "CITY"
POLICE DEPARTMENT, UNIDENTIFIED
OFFICERS "JOHN DOES" AND "JANE DOES" 1-5
NAMES FICTITIOUS, TRUE NAMES UNKNOWN
INTENDED TO DESIGNATE POLICE OFFICERS
AND DETECTIVES OF THE 19TH PRECINCT AT
THE TIMES AND PLACES ALLEGED,

Defendants.

JOINT PROPOSED DISCOVERY PLAN

1. **Date for the Parties to exchange of Rule 26(a) disclosures:** September 2, 2014
2. **Deadline for seeking leave to Amend Pleadings:** September 30, 2014
3. **Deadline for completion of all fact discovery:** April 16, 2015
4. **Subjects on which fact discovery may be needed:** Allegations in the Complaint. Discovery does not need to be conducted in phases or focused on particular issues.
5. **Electronically-stored information that may be discoverable and the forms in which the information may be available and produced:** The parties agree to discuss the relevancy, availability and retrieval of electronically-stored information as necessary throughout the discovery period.
6. **Privilege Issues/Protective Order:** The parties anticipate that there may be limited issues relating to claims of privilege or confidentiality of information throughout the discovery process. The parties agree to address each issue on a case-by-case basis.

mkf

7. Limitations on Discovery:

- a. **Interrogatories: Deadline for Service of First Request for Production of Documents and Interrogatories:** October 30, 2014. Each party shall be limited to twenty-five (25) interrogatories, including parts and sub-parts, to any other party. In the event that additional interrogatories are sought by any party, the parties agree to meet and confer in order to resolve the issue prior to bringing the matter to the Court's attention.
- b. **Depositions:** Each party shall be limited to no more than ten (10) depositions per party.

8. Expert Discovery:

- a. **Deadline for completion of all expert discovery:** August 1, 2015
- b. **Plaintiff:**
 - i. **Type of Experts** Mental Health/Psychological & Police Procedures
 - ii. **Number of Expert Witnesses** 2
 - iii. **Due date for service of expert reports:** April 16, 2015
- c. **Defendant Barneys:**
 - i. **Type of Experts:** Rebuttal to Plaintiff's experts
 - ii. **Number of Expert Witnesses** 2
 - iii. **Due date for service of expert reports:** 2 months after service of Plaintiff's expert reports
- d. **Defendants the City of New York, Alexander Kremer, Stephen Barrett, and the New York City Police Department:**
 - i. **Type of Experts:** Rebuttal to Plaintiff's experts
 - ii. **Number of Expert Witnesses** 2
 - iii. **Due date for service of expert reports** 2 months after service of Plaintiff's expert reports
- e. **IME examinations:** Plaintiff will submit to independent medical examinations conducted by Defense experts.

9. Types of contemplated dispositive motions: Summary Judgment



By: Keisha-Ann G. Gray
Keisha-Ann G. Gray
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036
kgray@proskauer.com
Telephone: 212.969.3000
Attorneys for Defendant
Barneys New York, Inc.

Dated: 8/20/14

By: Patrick N. Beath
Patrick N. Beath
New York City Law Department
Office of the Corporation Counsel
100 Church Street
New York, NY 10007
pbeath@law.nyc.gov
Telephone: 212.356.2656
Attorneys for Defendants
The City of New York, The New York
City Police Department, POM Alexander
Kremer, and LSA Stephen Barrett

Dated: 8/20/14

By: Michael B. Palillo
Michael B. Palillo
Law Office of Michael B. Palillo, P.C.
277 Broadway, Suite 501
New York, NY 10007
palillolaw@aol.com
Telephone: 212.608.8959
Attorneys for Plaintiff

Dated: 8-20-2014

SO ORDERED:

Robert P. Patterson
Hon. Robert P. Patterson, U.S.D.J.

MP2